

APPENDIX C

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-445/85-11 Construction Permit: CPPR-126

Docket: 50-445 Category: A2

Applicant: Texas Utilities Electric Company (TUEC)
Skyway Tower
400 North Olive Street
Lock Box 81
Dallas, Texas 75201

Facility Name: Comanche Peak Steam Electric Station (CPSES)
Unit 1

Inspection At: Glen Rose, Texas

Inspection Conducted: August 1 - 31, 1985

Inspectors: *Dennis L. Kelley* 10/8/85
D. L. Kelley, Senior Resident Reactor Inspector (SRRI), Date
Region IV CPSES Group

W. F. Smith 10/8/85
W. F. Smith, Resident Reactor Inspector (RRI), Region IV Date
CPSES Group

Reviewed by: *I. Barnes* 10/8/85
I. Barnes, Group Leader, Region IV CPSES Group Date

Approved: *T. F. Westerman* 10/9/85
T. F. Westerman, Chief, Region IV CPSES Group Date

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Areas Inspected: Routine, unannounced inspection of (1) applicant actions on previous inspection findings, (2) plant tours, and (3) plant status. The inspection involved 48 inspector-hours onsite by two NRC inspectors.

Results: Within the three areas inspected, no violations or deviations were identified.

DETAILS1. Persons ContactedApplicant Personnel

J. C. Kuykendall, Manager, Nuclear Operations
C. H. Welch, Quality Assurance Supervisor
R. B. Seidel, Operations Superintendent
R. E. Camp, Startup Manager
S. N. Franks, Special Project and Technical Support Lead
M. R. Blevins, Maintenance Superintendent
D. E. Deviney, Operations QA Supervisor
R. A. Jones, Manager, Plant Operations

The NRC inspectors also interviewed other applicant employees during this inspection period.

2. Applicant Actions on Previous Inspection Findings

- a. (Open) Unresolved Item 8431-02: The NRC inspector identified a change to preoperational test procedure 1CP-PT-37-02-REDO that indicated an alarm on the main control board (1-XA-2490) would not annunciate upon condensate transfer pump low suction pressure because the alarm was designed to annunciate upon pump trip due to overload only, thus the requirement in the test procedure to observe the alarm during the low suction pressure trip test was deleted. The NRC inspector checked the previous performance of the same test 2 years earlier (1CP-PT-37-02) and noted that the alarm should have been observed during the low suction pressure test as evidenced by the System Test Engineer's (STE's) signature. However, the STE annotated in the test log that the alarm worked "backwards" and further noted that this was corrected. In the absence of a design change occurring between the two tests the NRC inspector was unable to determine why the low pressure trip alarm should not function when the test was repeated in 1984 (1CP-PT-37-02-REDO). The applicant subsequently explained that the original STE's log entry was misleading; the low suction pressure trip alarm never existed, nor was it designed to exist. The STE signoff in the original test, according to the applicant's representative, did not certify the annunciator change of state because at the time, observing annunciator performance was not a test attribute, but rather was for information only. The official test of the annunciator was to be completed by another test procedure. This practice was in effect in 1982 but has since been changed to require annunciator performance to be part of the certification of test step completion. Documented

clarification of what actually occurred during ICP-PT-37-02 has been reviewed by the NRC inspector but has not yet, as of the close of this inspection period, been incorporated into the test record. Therefore this item shall remain open pending verification that the test record has been supplemented.

- b. (Open) Open Item 8445-03: During inspection of the completed data package for preoperational test ICP-PT-66-01, "Nuclear Instrumentation System," the NRC inspector noted that a Test Procedure Deviation (TPD) was processed to delete the requirement to obtain source range nuclear instrument data at the hot shutdown panel. The reason given was failure of the meters to function properly, and the TPD further indicated that the replacement meters would be retested on TDR 3014. The retest was deleted from TDR 3014, referencing TDR 3547 as the retest document. However, the retest had been subsequently deleted from TDR 3547, leaving an open document trail.

As committed, the applicant produced documents that showed a satisfactorily completed retest of one of the source range channels at the hot shutdown panel. The other channel had been modified by a design change which established a separate emergency source range panel, that when activated, provides source range indication at the hot shutdown panel even if the main control room and the nuclear instrument system is out of commission. This separate system was tested in accordance with ICP-AT-66-03, "Emergency Source Range Panel." The NRC inspector reviewed the completed data package for this test and found no discrepancies. To maintain continuity in the document trail, TDR 4125 was issued as a supplement to ICP-PT-66-01 to provide documented evidence in the completed data package that the source range instrument had been properly retested. As of the close of this inspection period, the supplement had not been incorporated into the permanent test record. This item shall remain open pending verification that the test record has been supplemented.

No violations or deviations were identified during this portion of the inspection.

3. Plant Tours

During this reporting period, the SRRI and RRI conducted inspection tours of Unit 1. In addition to the general housekeeping activities and general cleanliness of the facility, specific attention was given to areas where safety-related equipment was installed and where activities were in progress involving safety-related equipment. These areas were inspected to ensure that:

- . Work in progress was being accomplished using approved procedures.

- . Special precautions for protection of equipment were implemented, and additional cleanliness requirements were being adhered to for maintenance, flushing, and welding activities.
- . Installed safety-related equipment and components were being protected and maintained to prevent damage and deterioration.

Also during these tours, the SRRI and RRI reviewed the control room and shift supervisors' log books. Key items in the log review were:

- . plant status
- . changes in plant status
- . tests in progress
- . documentation of problems which arise during operating shifts

No deviations or violations were identified, however, during a tour of the control room, the NRC inspectors noted some small pieces of dirt and debris had fallen to the top of the control panel from scaffolding that was installed for ceiling modifications. This was apparently caused by inadequate seals around existing structure above the panels. This was discussed with the applicant who acknowledged the problem. Protection of the control panels will be routinely and specifically observed during future Resident Inspector tours to ensure corrective action is taken and control panel protection is properly maintained while the ceiling modification is in progress.

4. Plant Status as of August 31, 1985

- a. Unit No. 1 is reported to be 99% complete, however, excavation is underway to facilitate replacement of main condenser internals, and a significant amount of rework is being done on the control room ceiling.
- b. The following operations related findings are open pending applicant action and NRC followup inspection to confirm completion for closure:

Violations	8
Deviations	0
Open Items	90

Unresolved	<u>12</u>
Total	110

Action is underway to complete these items. Closure will be documented in future inspection reports.

- d. Unit No. 2 is reported to be 75% complete. The preoperational test program on systems associated with NRC inspections has not yet started.

5. Exit Interview

An exit interview was conducted August 29, 1985, with applicant representatives identified in paragraph 1 of Appendix E of this report. During this interview, the operations RRI summarized the scope and findings of the inspection. The applicant acknowledged the findings.